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Attorneys for Defendant: MUHAMMAD MUDASSAR ANWAR

7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**

9 AMAZON.COM, INC et al,
10 Plaintiff,

11 vs.

12 MUHAMMAD MUDASSAR
13 ANWAR, an individual, TECH DRIVE
14 PVT, LLC, a New York Limited
Liability Company, et al.

15 Defendants.

Case No.: 3:23-cv-05580-TLT-RI

**MUHAMMAD MUDASSAR
ANWAR DECLARATION IN
SUPPORT OF MOTION TO
SETASIDE DEFAULT AND
DISMISS CASE FOR LACK OF
PERSONAL JURISDICTION**

Hearing

Date: February 25th, 2025

Time: 2:00 p.m.

Place: 450 Golden Gate Avenue,
Courtroom #9 (19th Floor) San
Francisco, CA 94102.

[Filed concurrently with notice of
motion, proposed order and
memorandum of points and authorities]

23 **MUHAMMAD MUDASSAR ANWAR DECLARATION IN SUPPORT OF**
24 **MOTION TO SETASIDE DEFAULT AND DISMISS CASE FOR LACK OF**
25 **PERSONAL JURISDICTION** within the 14 day deadline set by the Court.
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1 Defendant deserves his day in court as he has a meritorious defense – he didn't do
2 the unlawful acts alleged, whoever stole his identity did it.

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4 1. I, MUHAMMAD MUDASSAR ANWAR, hereby declare as follows:

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6 I am the defendant named in this action. I make this declaration based on personal
7 knowledge of the information contained in this declaration and, if called upon to
8 do so, could competently testify to the information set forth in this declaration.

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10 2. I live in Scarsdale, New York and have for all times relevant to this
11 complaint, for the last 7 years.

12 3. I am the owner of Tech Drive PVT, also named as a Defendant in this case.

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14 The company is located in New York at all relevant times, but is now closed.

15 4. I deny the allegations made in the complaint.

16 5. I have never had any offices in California.

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18 6. I do not do any business targeted to California.

19 7. I did not register the domain name they are accusing me of.

20 8. I do not own any real estate or other property in California.

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22 9. I have never had any employees, or agents in California.

23 10. I have never had any businesses running in California.

24 11. I never created any websites as Plaintiff alleges, and never inserted a
25 California address as Plaintiff claims.

26
27 12. I had no reason to believe I could be sued in California, and it would cause
28

me great financial hardship to be forced to litigate this case in California.

13. I am not the guilty party in this case as I was a victim of identity theft.

14. I filed a police report with the New Rochelle police department. See attached **Exhibit “1”** for a true and correct of the police report.

15. I have never owned a 408-area code phone number and did not add this to any website.

16. Date I First Learned of the Lawsuit: I first became aware of the lawsuit on October 30, 2023, when I was informed that a lawsuit had been filed against me in the United States District Court, California. This was the first time I realized that my name and personal information were being used fraudulently.

17. Date I First Learned of Identity Theft: Upon receiving the lawsuit notice on October 30, 2023, I started investigating and realized that someone had used my personal information without my authorization to register certain websites that Amazon claims are linked to fraudulent activity. I had no involvement with these websites, never authorized their creation, and had no knowledge of the individuals responsible.

18. Reason for Delay in Reporting Identity Theft (10-Month Gap): After learning about the identity theft, I took immediate action to gather evidence and understand the scope of the fraud. Once I confirmed unauthorized use

1 of my personal information, I formally reported the identity theft to the
2 New Rochelle Police Department on October 26, 2024, and obtained an
3 official police report (Report #24-004138). The police report documents the
4 fraudulent use of my name and details how my information was falsely
5 associated with the domains or websites in question.
6

7
8 19. I never registered or operated the websites Amazon is claiming.

9 20. My contact information was falsely associated with these domains.

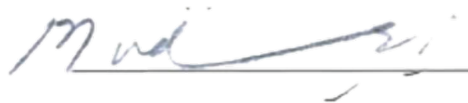
10 21. I have never had any affiliation with the individuals (i.e. other Defendants)
11 involved in this matter as alleged.

12 22. I suspect that an unknown individual or entity used my credentials
13 fraudulently.

14 23. I have since closed all my bank accounts to prevent further fraudulent
15 activity.

16 I declare under penalty of perjury under the Laws of the United States of
17 America that the foregoing is true and accurate.

18 DATED this 17th day of 2025 at Scarsdale, NY 10583, New York.

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21 DECLARANT MUHAMMAD MUDASSAR ANWAR
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